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[Licensing] Kimmirut State of Compliance

1 message

Justin Hack <Justin.Hack@aandc-aadnc.gc.ca> Tue, Apr 1, 2014 at 12:44 PM
To: Ralph Ruediger <RRuediger@gov.nu.ca>
Cc: Erik Allain <Erik.Allain@aandc-aadnc.gc.ca>, Bharesh Roy <broy@gov.nu.ca>, Bill Westwell <Bwestwell@gov.nu.ca>, Damien Côté <damien.cote@nwb-oen.ca>, Phyllis Beaulieu <licensing@nwb-oen.ca>

Good Afternoon Ralph,

This is the list of Outstanding items AANDC-Field Operations has with the expired Water License for Kimmirut 3BM-KIM0207. For your information, many of these conditions were assumed fulfilled after the GN's last submission of documents on March 14, 2014; however, many of the documents were not up to the standard required by the Inspector in order to fulfill the outstanding conditions of the licence. There, these conditions remain outstanding.

Ralph, have your staff comment on each outstanding item in the space provided below each item. I have taken considerable time to review each document and the shortfalls associated with them. I expect a similar quality of work and that your comments **clearly** address each item **by Monday April 7, 2014**.

The Review of Hall Beach and Taloyoak's Water License will be forwarded when I have time to complete them.

If you have any questions, please contact me before April 7, 2014.

Regards,

Justin

License Condition	Deliverables	Original due date	Due Date, as per Compliance Plan	Status	Documented		General Comments
					on CIDMS (#)	On NWB ftp server (Y/N)	
B2	A monitoring program, which will include all sampling	January 9, 2009	March 31, 2013	Outstanding			Since the enhanced sewage disposal facility is not yet commissioned, only monitoring stations KIM-1,2 and 3 are active. In the 2013 Annual Report, sampling was conducted but it is not clear what monitoring station the results are associated with. The sampling results submitted must be clearly labelled KIM-1,2 or 3, or if that is not available, provide GPS coordinates, or some other description so I can identify what sampling occurred. Furthermore, monitoring station KIM-3, although not in an approved location, is in the realistic location to monitor sewage effluent discharge. I understand why this location is different than the licence; however, this change should be communicated to the NWB. These requested are to be completed by April 7, 2014.

GN Comments:

B5	Posted Signs	October 24, 2009	August 31, 2013	Outstanding			Please see comment for B2.
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GN Comments:

B9	Exp report on status of outstanding reports	NA	May 31, 2013	Outstanding	GN says, "exp has not produced this." This was part of your compliance plan and was supposed to be finished May 31, 2013. Please inform me on the status of this and if there are any other outstanding reports.
B9	Any available reports, studies, or plans	As they are completed	July 31, 2013	Outstanding	Fish study is still required and any other reports as identified in the above row.

GN Comments:

D1	Plan of Action for commissioning a sewage treatment facility	NA	July 1, 2013	Outstanding	The GN says, "Waiting for further study." This is not a Plan of Action. You must provide AANDC with a clear plan of action (i.e. steps required to commission the facility). The fish study and 'further studies' are just one part of the Plan of Action and not a complete Plan of Action. This is a priority item, I request you have this completed by April 7th, 2014.
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GN Comments:

D1	Fish study	NA	March 31, 2014	Outstanding	The fish study was supposed to be completed by March 31, 2014. The GN says this is completed but a copy has not been sent to the NWB or AANDC for review. Bhabesh says he will send that document to me.
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GN Comments:

D1	Direct sewage to either Sewage Disposal Facility or Enhanced Sewage Disposal Facility	January 9, 2009	N/A	Outstanding	They have not commissioned the new lagoon because they are waiting on the results of the fish study.
D2	Treating effluent	January 9, 2009	N/A	Outstanding	This will require the commissioning of the enhanced sewage facility, they will be out of compliance until the facility is commissioned.

GN Comments:

D5	Capital Plan	NA	March 31, 2014	Awaiting Submission	The capital plan will remain outstanding until it is submitted to the NWB and AANDC for review. However, the GN has outlined that, A wetland study was started in the summer of 2013 as part of the NWB requirements. It was noted that the wetlands were fish bearing. They outlined that they will use 2014 to identify if the "treated effluent is deleterious and/or if the lagoon will have to be relocated." Like the other points, the capital plan cannot be developed until they know what they are going to do with the enhanced sewage lagoon.
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GN Comments:

D7	Segregation of Wastes	January 9, 2009	August 31, 2014	Outstanding	Has this been done. Photo evidence or inspection to verify.
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GN Comments:

D7/D8	Solid Waste Strategy	NA	July 31, 2014	Awaiting Submission	This is to be submitted by July 31, 2014.
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GN Comments:

D7/D8	Capital Action Plan for Solid Waste	NA	July 31, 2014	Awaiting Submission	This is to be submitted by July 31, 2014.
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GN Comments:

D8	Implement measures to control wind blown litter	January 9, 2009	October 1, 2013	Outstanding	Require photo-evidence or inspector to verify
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GN Comments:

F1	O&M Manual for Solid Waste and Sewage Disposal Facility	April 9, 2009	July 1, 2014	Outstanding	GN states that, "This is not an engineered facility. We do not have developed yet." As per the license, an O&M plan is still required for the solid waste and sewage management facility. This will remain outstanding until this deliverable is met.
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GN Comments:

G1	A&R Plans	Due 6 months prior to its construction	February 28, 2014	Outstanding	This is required 6 months prior to construction to replace existing structures. The Enhanced Sewage Lagoon has already been constructed so therefore, A&R Plans are outstanding. This issue needs to be addressed, please comment on the process on how you will achieve this.
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GN Comments:

H	A monitoring program, which will include all sampling completed	January 9, 2009	March 31, 2014	Outstanding	Sampling has been done but Bhabesh needs to clarify exactly what sampling has been done. Refer to B2 for more information. This is to be completed by April 7, 2014.
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GN Comments:

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